

OptimizeRx Corporation

Human Rights Policy

STATEMENT OF INTENT

OptimizeRx Corporation (“OptimizeRx” or “Company” or “we” or “our”) is committed to excellence, aspiring to lead by example and conduct every aspect of our business with integrity. Our commitment extends to fostering a working environment that respects and protects internationally proclaimed human rights and avoids complicity in human rights abuses. We view this as an integral part of our collective responsibilities to our clients and customers, our colleagues, the marketplace, and society.

We endorse the UN Guiding Principles on Business and Human Rights. In line with these principles, we strive to avoid causing or contributing to adverse human rights impacts on our people and in the running of our offices, including in supplier procurement, and to address such impacts when they occur. Our Human Rights Policy (this “Policy”) reflects that commitment and describes our process for upholding it.

OVERVIEW

We seek to uphold human rights throughout our business. This Policy reflects that commitment and describes our process for upholding it.

We plan to review this Policy annually and to adjust it as needed to align with our evolving business practices and impacts.

OUR POLICY

Scope

To the extent that we ourselves act, and to the extent that we engage subcontractors and vendors in our business, we seek to uphold human rights principles by identifying risks:

1. In our own practices,
2. In the practices of our direct contractual partners, and
3. In the practices of our indirect contractual partners, in cases where we have an ability to exert a remedial influence over their practices.

If we identify a risk, we will take remedial action when necessary, which will depend upon the nature of the risk, our relationship to the risk (direct or indirect), and the degree of leverage or impact that we have with respect to the risk.

Human Rights

We believe that all human beings are born free and equal in dignity and rights as set forth in the International Bill of Human Rights, and deserve those rights without regard to their race, color, sex, language, religion, political or other opinion, national, ethnic, or social origin, property, birth, or other status.

By upholding universal human rights as part of the International Bill of Human Rights, our business aligns and acts in line with:

- The Universal Declaration of Human Rights (1948);
- The International Covenant on Civil and Political Rights (1966);
- The International Covenant on Economic, Social and Cultural Rights (1966);
- The Optional Protocol to the International Covenant on Civil and Political Rights; and
- The Optional Protocol to the International Covenant on Economic, Social and Cultural Rights.

We avoid infringing on the human rights of others and commit to using reasonable diligence to uncover negative impacts, particularly among our contractual partners and vendors.

When we identify any negative impacts that we cause or contribute to, we commit to assessing available options for remediation, and to seeking such remediation when appropriate. Remediation may include exerting influence on our suppliers, vendors, or contractual partners to change their practices.

Worker Rights

We support the labor principles set forth in the ILO Declaration on Fundamental Principles and Rights at Work, namely:

- freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced or compulsory labor;
- the effective abolition of child labor;
- the elimination of discrimination in respect of employment and occupation; and
- a safe and healthy working environment.

In addition to those principles, we do not violate or condone the violation of applicable labor and employment laws, including laws regarding wages and benefits.

Women's Rights

We acknowledge that women's rights are human rights. These rights include the right to live free from violence, slavery, and discrimination; to be educated; to own property; to vote; and to earn a fair and equal wage.

Our policies and practices are in accordance with the goal of attaining equality between women and men, and eliminating all forms of discrimination against women.

Modern Slavery Mitigation

OptimizeRx mitigates against risks of human trafficking and slavery in its supply chain by selecting vendors for cloud computing services and other software providers who are based in the United States and do not use overseas labor in places known to pose these risks.

Conflict Areas and Minerals

We do not currently purchase minerals directly or indirectly for our business needs. However, if this changes in the future, then we will adopt a human rights due diligence process with respect to such mineral purchases. In conflict-affected situations and high-risk areas, the complexity of our human rights due diligence process will be heightened accordingly. Our due diligence for conflict-affected regions is built around the concept of proportionality: the higher the risk, the more complex the processes.

The complexity of our due diligence processes also depends upon the operating context, the size, and nature of our business activities under scrutiny, the relationships associated with those activities and the severity of the potential adverse human rights impacts.

When applicable, we intend to follow the EU Commission Recommendation 2018/1149 guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks under Regulation (EU) 2017/821 of the European Parliament and of the Council.